

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**SANDRA DENISE CURL AND  
PERCY LEROY JACOBS,**

**Defendants**

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**CRIMINAL NO. GJH-19-444**

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**GOVERNMENT’S MOTION IN LIMINE  
FOR RELIEF UNDER RULE 49.1**

The United States of America, by and through its attorneys, hereby moves for certain relief under Federal Rule of Criminal Procedure 49.1. In keeping with Rule 49.1, the government will redact the trial exhibits in this case so that names of minor children will be redacted to the initials and financial account numbers to the last four digits. However, unless the Court orders otherwise, Rule 49.1(a) also requires that social security or taxpayer-identification numbers be redacted to the last four digits, dates of birth to the year, and home addresses be redacted to the city and state.

In this case, the government requests permission to leave social security numbers, dates of birth, and home addresses used by the defendants unredacted in its trial exhibits because that information is directly related to proving their identities as the persons engaged in the conduct charged in the indictment.

Accordingly, the government proposes that the Court allow the government’s trial exhibits to be presented to the jury without the redaction of social security numbers, dates of birth, and home addresses used by the defendants. If the Court deems it necessary, it may place these items under seal if and when the trial exhibits become part of the public record. See Fed. R. Crim. P. 49.1(d); see also Advisory Committee Notes to Fed. R. Evid. 49.1 (“Trial exhibits that

are not initially filed with the court must be redacted in accordance with the rule if and when they are filed as part of an appeal or for other reasons.)

WHEREFORE, the government respectfully requests that the Court enter an order permitting the government's trial exhibits to be presented to the jury without redacting social security numbers, dates of birth, and home addresses used by the defendants.

Respectfully submitted,

Jonathan Lenzner  
Acting United States Attorney

/s/ Jeffrey McLellan  
Jeffrey A. McLellan  
Trial Attorney, Tax Division  
U.S. Department of Justice

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and that service on counsel and standby counsel of record will be accomplished by the CM/ECF system. Service will be effected on the *pro se* defendants by email attachment.

/s/ Jeffrey McLellan  
Jeffrey A. McLellan  
Trial Attorney, Tax Division